- 1	Navada Par No. 11405	
$_{2} $	Nevada Bar No. 11405 ADRIAN A. KARIMI, ESQ.	
	Nevada Bar No. 13514	
3	LADAH LAW FIRM 517 S. Third Street	
4	Las Vegas, NV 89101	
5	litigation@ladahlaw.com T: 702.252.0055	
3	Attorney for Plaintiff	
6	Kara Grandison	
7	UNITED STATES DISTRICT COURT	
8	DISTRICT OF NEVADA	
9	KARA GRANDISON, an individual,	CASE NO. 2:19-cv-01880-APG-VCF
10	Plaintiff,	
11	vs.	STIPULATION AND ORDER TO
12	LECHELE CHILTON, an individual; GEICO	EXTEND PLAINTIFF'S DEADLINE TO FILE HER RESPONSE TO
13	CASUALTY COMPANY, a foreign corporation; DOES I through XX, inclusive and ROE CORPORATIONS I through XX,	DEFENDANTS' MOTION FOR PARTIAL SUMMARY JUDGEMENT AND TO EXTEND DEFENDANTS'
14	inclusive,	DEADLINE TO FILE A REPLY TO PLAINTIFF'S RESPONSE TO
15	Defendant.	DEFENDANTS' MOTION TO DISMISS
16		PLAINTIFF'S COMPLAINT AGAINST LECHELE CHILTON
17		
18	Plaintiff, KARA GRANDISON, by and through her counsel of record, Ramzy P. Ladah and	
19		
20	Adrian A. Karimi of LADAH LAW FIRM, and Defendants GEICO ADVANTAGE INSURANCE	
21	COMPANY, erroneously sued as "GEICO CASUALTY COMPANY" ("GEICO"), and LECHELE	
22	CHILTON, by and through their attorneys of record, Thomas E. Winner and Caitlin J. Lorelli of	
23	WINNER & SHERROD, hereby stipulate to an extension of time for Plaintiff to oppose	
	Defendants' Motion for Partial Summan, Judament and/on on the the Alternative Medien To	
24	Defendants' Motion for Partial Summary Judgment and/or or In the Alternative, Motion To	
25	Bifurcate Extra-Contractual Causes of Action; and to an extension of time for Defendants to reply	
26	to Plaintiff's Response to Defendants' Motion to Dismiss Plaintiff's Complaint Against LeChele	
27	Chilton in Accordance with FRCP 12(b)(6), on fi	lle herein. (ECF No. 12, 14 & 15).

H LADAH LAW

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REASONS FOR REQUESTED EXTENSION

Defendant filed its Motion to Dismiss Plaintiff's Complaint Against Lechele Chilton in Accordance with FRCP 12(b)(6) (ECF No. 12) on December 5, 2019, and Plaintiff's Response (ECF No. 15) was filed on December 18, 2019. A reply is due on or before Wednesday, December 25, 2019.

Defendant filed its Motion for Partial Summary Judgement and/or or In the Alternative, Motion to Bifurcate Extra-Contractual Causes of Action (ECF No. 14) on December 6, 2019. Plaintiff's Response is due on or before Friday, December 27, 2019.

Due to introduction of new counsel, and the immediate Holidays, Plaintiff requested, and Defendant's counsel kindly agreed, to extend the deadline for Plaintiff to respond to Defendant's Motion for Partial Summary Judgement to January 8, 2020. The parties also stipulate that Defendant's Reply to their Motion for Summary Judgement be adjusted accordingly.

The parties further stipulate that the Defendant Reply to Plaintiff's Response to Defendant's Motion to Dismiss Plaintiff's Complaint Against LeChele Chilton now be due on January 8, 2020.

The parties enter this stipulation in good faith, and not for reasons of delay or any other untoward purpose.

DATED this 5th day of December, 2019. DATED this 5th day of December, 2019.

LADAH LAW FIRM WINNER & SHERROD

/s/: Caitlin Lorelli, Esq. /s/: Ramzy Ladah, Esq. THOMAS E. WINNER RAMZY P. LADAH Nevada Bar No. 5168 Nevada Bar No. 11405 CAITLIN J. LORELLI ADRIAN A. KARIMI Nevada Bar No. 14571 Nevada Bar No. 13514 1117 South Rancho Drive 517 S. Third Street Las Vegas, NV 89102 Las Vegas, NV 89101 Attorneys for Defendants Attorneys for Plaintiff

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ORDER

Pursuant to the Stipulation of the Parties, it is hereby ORDERED, ADJUDGED, AND DECREED that Plaintiff's Response to Defendants' Motion for Partial Summary Judgment and/or in the Alternative, Motion To Bifurcate Extra-Contractual Causes of Action, is due on or before January 8, 2020. It is further ORDERED, ADJUDGED, AND DECREED that Defendants' Reply in support of their Motion to Dismiss LeChele Chilton is due on or before January 8, 2020 and that Defendants' Reply to their Motion for Partial Summary Judgement be adjusted accordingly in light of the new Response date above.

IT IS SO ORDERED, this 26th day of December, 2019.

UNITED STATES DISTRICT JUDGE